

**SAN DIEGO COUNTY WATER AUTHORITY**  
**Comments on CALFED Draft Programmatic EIS/EIR**

**Programmatic EIS/EIR**

*Unless stated otherwise, all pages numbers cited refer to the Programmatic Environmental Impact Statement/Environmental Impact Report.)*

Page 2-10. The list of potential concerns about the ecosystem restoration program should be expanded to include a bullet on the potential drinking water quality impacts of some ecosystem restoration activities.

Page 2-12. The last bullet under benefits of the Water Quality Program should be amended to read "At some locations in the Delta, Reduces concentration of some compounds contributing to trihalomethane formation potential and degradation of drinking water supplies. The Water Quality Program will not reduce the concentration of bromide at drinking water supply intakes. Bromide is also a disinfection by-product precursor."

Page 2-12. The list of potential concerns about the Water Quality Program should be expanded to include, "The Water Quality Program will not reduce bromide, a disinfection by-product precursor".

Page 2-37. The latest draft of the California 4.4 Plan is dated December 17, 1997.

Page 2-38. We agree with the assumption that successful implementation of a plan that allows California to live within its 4.4 million acre-feet Colorado River is necessary to balance the supply and demand for Delta water. The water conservation and transfer agreement between our agency and the Imperial Irrigation District, which was signed on April 29 of this year, is a linchpin of the California 4.4. Plan.

Page 6.1-12, Alternative 3. The summary of Storage and Conveyance Impacts should include a discussion of the reduction of TOC and bromide concentrations that would occur at the CVP/SWP export pumps under Alternative 3.

6.1-17, second column, fourth paragraph. The second sentence should be amended to state that ozone, when combined with bromide, also produces undesirable by-products.

**Water Use Efficiency Component Technical Appendix**

Page 1-3, third paragraph. The last sentence should be revised to clarify that CALFED efforts to implement conservation measures that are cost-effective from a statewide perspective, but not from the perspective of the local water user or water supplier, will not result in financial or other burdens on local water users or water suppliers beyond

those contained in the *Memorandum of Understanding Regarding Urban Water Conservation in California* (Urban MOU) and *Memorandum of Understanding Regarding Efficient Water Management Practices by Agricultural Water Suppliers in California* (Agricultural MOU).

Page 1-6, Table 1-1. The urban conservation projections in this table are inconsistent with those found elsewhere in the report. Specifically, the Bulletin 160-98 baseline is shown in Table 1-1 as a separate increment of conserved water in addition to the water projected to be conserved under the No Action scenario. Table 5-5 and text in Chapter 5 suggest that the Bulletin 160-98 baseline projection is *included* in the No Action projection. Which table is correct?

Page 1-6, second paragraph. The paragraph should stress that CALFED's approach to water use efficiency is not to pursue specific water savings or recycling targets, but to assure that appropriate efficiency measures are implemented. Actions can be assured; results cannot.

Page 1-7, Table 1-3. We are concerned that the projected real water savings from urban water conservation are overstated under both the No Action and CALFED Program scenarios. It is unlikely that all urban BMPs will be found cost-effective in all areas of the state by 2020 as presumed under the No Action scenario. Assuming that not all BMPs meet the local cost-effectiveness test, substantial public funding will be needed to achieve even those levels of conservation identified under the No Project scenario. We are also concerned that the water savings projected under the CALFED Program scenario assume the development of additional technologies and incentives beyond those suggested in the Urban MOU. Urban water conservation projections should be based on realistic, tested data consistent with the urban BMPs.

Page 2-1, first paragraph. We agree that implementation of water use efficiency measures, even in those areas where water would otherwise return to the hydrologic system in usable form, can provide ecosystem and water quality benefits that contribute toward CALFED objectives. The Urban and Agricultural MOUs, however, provide that agencies must only implement those efficiency measures that are cost-effective at the local level. Where there is a statewide interest in pursuing conservation or recycling above the threshold of a local cost-effectiveness test, statewide funding should be provided to effect these actions.

Page 2-1, Program Linkages, Water Quality. We would suggest adding the following to the end of this section: "Increases in irrigation efficiency may also result in long-term degradation of urban and agricultural soil quality due to salt accumulation."

Page 2-1, Program Linkages, Financing. This paragraph could be inappropriately interpreted to mean that because water cost increases tend to make water use efficiency measures more economically attractive, cost increases are desirable as an

end unto themselves and should be supported as a policy objective. CALFED Program costs should be equitably apportioned to all Program beneficiaries, without regard to their effect on the economic viability of specific water use efficiency measures.

Page 2-5, second paragraph. All urban BMPs may not be cost-effective for every agency. The third sentence in this paragraph should be revised to read, "These Best Management Practices are appropriate for analysis and consideration by almost every agency ...."

Page 2-12, fourth paragraph. The proposal to offer incentive payments to encourage the implementation of practices that meet CALFED objectives but are not cost-effective at the local level is a good one and should be added to the Urban Water Use Efficiency Approach as well.

Page 2-14, first paragraph. We are concerned with how linkages between water use efficiency and other elements of the CALFED Program are developed. Once a set of conservation assurances has been developed, CALFED water supply benefits should not be withheld from agencies pursuing good faith efforts due to the non-performance of others.

Page 2-15, Conservation Implementation, Reporting and Certification. We support the CUWCC as the appropriate agency to certify and evaluate agency compliance with the Urban MOU and develop a set of assurance measures that emphasizes incentives over regulatory actions. We support a similar role for the Agricultural Water Management Council.

Page 2-16, third paragraph. The Urban Water Management Plan (UWMP) certification process, if established, must be clear, objective, and consistent with the requirements of the Urban Water Management Act. We believe that DWR review of UMWPs to verify inclusion of water recycling elements consistent with the CUWA/WaterReuse Recycling Guidebook is sufficient to ensure that cost-effective recycling projects will be implemented. Such a review must not second guess the policy judgment of the local agency, but should only verify that the agency has included a recycling element in the UWMP and followed the basic planning principles described in the Guidebook.

Page 2-18, fourth paragraph. A distinction should be made between certification responsibilities, which should be performed by the CUWCC or a similar stakeholder agency, and enforcement actions, which should be performed a regulatory agency.

Page 4-41, Special Conditions, first paragraph. We disagree with the use of the word "limited" to describe the role of the Imperial and Coachella Valleys in a CALFED solution. The California 4.4 Plan will provide urban Southern California with water that, if not conserved in the Imperial and Coachella Valleys, may have to come from the Bay-

Delta. In that sense, the Imperial and Coachella Valleys may play a substantial role in the Bay-Delta solution.

Page 4-42, second paragraph. Under certain circumstances, the Coachella Valley Water District may receive up to 50,000 acre-feet of water conserved under the transfer agreement between Metropolitan and the Imperial Irrigation District. The second sentence in this paragraph should be revised to read, "This landmark agreement will result in just over between 50,000 and 100,000 acre-feet annually being transferred from agricultural uses in the imperial Valley to urban uses in Southern California."

Pages 5-4 and 5-5, General Statewide Assumptions. We concur with CALFED's assumption that water conserved by urban agencies will first be used to offset increasing unmet demands and therefore will not result in reduced demands on the Delta. We also concur with the assumption that water savings experienced by export areas importing water sources in addition to Delta water may be used to offset shortfalls in other supplies, such as Colorado River supplies, and will not necessarily result in a reduction of Delta exports.

Page 5-11, last paragraph. We question whether indoor residential water use of 50 to 60 gallons per capita per day (a 14 to 16 percent reduction beyond that projected under the No Action scenario) is "ample for continuation of existing lifestyle habits". While we are hopeful that new technology will be developed which facilitates these additional water savings, we do not believe that CALFED planning efforts should assume the development of such technology. We strongly support additional public funding for research into new water conservation techniques and technologies, as proposed on page 1-3.

Page 5-11, last paragraph. Does the methodology used to forecast irrigated urban landscape acreage assume any change in the mix of housing units or increase in population density? It seems likely that the amount of irrigated landscape per capita would decrease if population densities increase. To the extent that the forecasting methodology overstates future irrigated urban acreage, it also overstates future water demands and potential water savings.

Page 5-23, Table 5.7. Does this table reflect only system losses or does it include "unaccounted" water, such as water used for fire suppression, hydrant flushing and other unmetered activities? If Table 5.7 refers only to system losses, then the 9 percent loss estimated for the South Coast Region appears to be too high. If the table includes unaccounted water, then the projected water savings from leak reduction programs are overstated, since unaccounted water use will not be affected by leak reduction programs.

Page 6-1, first paragraph. In California, tertiary treated, disinfected recycled water is permitted for most non-potable uses, not all non-potable uses as stated in the first paragraph. The paragraph should be expanded to state that the use of recycled water generally requires the installation of a separate non-potable distribution system, which can be prohibitively expensive.

Page 6-2, first paragraph. The paragraph should note that, as is the case with water conservation, water recycling can produce water quality and ecosystem benefits that contribute to CALFED's objectives, even in those areas where the water would otherwise return to hydrologic system in usable form (e.g., the Sacramento River).

Page 6-5, last paragraph and page 6-6, first paragraph. These paragraphs incorrectly imply that all wastewater flows are suitable for recycling when, in fact, a significant portion of these flows may be unsuitable for recycling due to poor wastewater quality. Salinity, in the form of Total Dissolved Solids (TDS), is the constituent which most frequently limits the suitability of wastewater flows for recycling, but chloride, boron, fluoride, manganese, sulfate, calcium and magnesium can also pose problems. In general, recycled water with a Total Dissolved Solids (TDS) level greater than 1,000 mg/L is of marginal suitability for irrigation. A number of agricultural crops common to Southern California, including cut flowers, citrus and avocados, require even lower TDS levels. In a recent study, the Metropolitan Water District of Southern California (Metropolitan) found that about half of the wastewater flows generated in its service area contain TDS levels of 1,000 mg/L or greater (*Salinity Management Study Phase 1*). Because the tertiary treatment process does not remove TDS, the use of those poorer quality wastewater flows for irrigation, groundwater recharge, and other non-potable uses may entail the addition of advanced treatment (i.e., membrane treatment) to the recycling process. This additional treatment requirement may make recycling these wastewater flows prohibitively expensive.

Page 6-7, first paragraph. While we agree that the timing of when recycled water is available is a critical limitation to the amount of recycling ultimately realized, we would suggest that the size and location of demands is of equal importance, as is the quality of wastewater available for recycling.

Page 6-8, third paragraph. This paragraph states that a project in San Diego will be the first to treat a significant quantity of wastewater and recycle it into San Diego's drinking water. The paragraph should be revised to state that this project is still at the environmental review stage and has not been approved for implementation by either the City of San Diego or state permitting authorities. At present the EIS/EIR is due to be released in early 1999.

Page 6-10, Table 6-2. Table 6.2 identifies a total recycling potential of 837,000 acre-feet from "planned" projects. What portion of this projected yield is from projects at the feasibility study and preliminary design stage? We believe that the assumption that all

projects currently undergoing feasibility study and preliminary design will be found feasible and implemented by 2020 is overly optimistic and not reflective of past project implementation rates.

Page 6-10, footnote. This footnote is inconsistent the No Action conditions described in Volume 1 of the Draft PEIS/R and with comments made by CALFED staff. Page 2-23 in Volume 1 of the Draft PEIS/R indicates that CALFED has assumed the California 4.4 Plan will not lead to additional demands on Delta water. CALFED staff have also stated publicly that the analysis in the Draft PEIS/R assumes a full Colorado River Aqueduct. By assuming both a 4.4 Plan and the development of recycled water projects that might occur if Colorado River issues remain unresolved, CALFED appears to be "double counting" water supplies.

Page 6-11, last paragraph. Has CALFED analyzed the potential impact of the levels of water conservation projected under the CALFED Program scenario on the quality of wastewater flows available for recycling?

Page 6-12, second paragraph. We believe that the levels of recycling identified under the No Action conditions exceed the levels of recycling that can be achieved without CALFED funding assistance, and may represent a practical upper limit under the CALFED Program conditions. The cumulative estimates of water recycling potential should be revised to reflect the level of planning completed for potential projects, the estimated cost of those projects, and the quality of wastewater available for recycling.

Page 7-3, Objectives of the Water Transfer Element. We support the development of uniform and equitable rules for transfers using state and federal facilities and cross-Delta conveyance. This objective should apply to transfers that use regional conveyance facilities as well. One of the biggest obstacles to development of an active water transfers market is the lack of uniform rules or even a uniform approval process.

Page 7-5, Issues to Resolve in Developing an Effective Water Market. The list of issues to resolve should be expanded to include access to capacity in regional conveyance facilities at a price that reflects the actual cost of the facilities used for the transfer. From our perspective, protection of the water rights of those who wish to transfer water and access to conveyance capacity at a reasonable cost are the two most important issues needing resolution if an expanded water market is to occur.

Page 7-13, Solution Options for the Nature, Extent and Ability to Mitigate Third Party Impacts. A clear nexus must be established between the level of any water transfer tax or mitigation fee, and the third party impacts it is designed to mitigate. Based on the level of third party impacts identified to have occurred under previous water transfers, the transfer tax proposed in the 1996 Model Water Transfer Act (\$5 per acre-foot) appears adequate to offset third party impacts. The establishment of an

unreasonably high transfer tax or mitigation fee will impede the development of a water transfers market.

Pages 7-16 and 7-17, Possible Functions of a Water Transfers Clearinghouse. We support the establishment of a statewide clearinghouse to collect and make available information on water transfers. To facilitate the establishment of an efficient transfer market and maintain credibility among all parties, the clearinghouse should be operated from a neutral third-party perspective and neither advocate nor oppose specific water transfers. The establishment of priorities for different types of water transfers, as suggested in the last bullet on page 7-17, is inconsistent with a neutral perspective and should not be pursued. The clearinghouse should not have regulatory authority, nor should its "brokerage" role extend beyond the collection and dissemination of information. Due to the general public benefits the clearinghouse would produce, we believe the clearinghouse should be funded with public moneys.

Page 7-16, Possible Functions of a Water Transfers Clearinghouse. In providing advice and assistance, and performing analyses, the clearinghouse must be careful to maintain a neutral role. The last bullet on this page should be amended as follows: "Provide advice and assistance to local decision makers as requested on technical analysis, environmental impacts and economic impacts."

Page 7-17, Possible Functions of a Water Transfers Clearinghouse. The third bullet on this page should be amended as follows: "Provide recommendations to decision makers as requested on ways to avoid, minimize or mitigate environmental or economic impacts."

Page A-5, last paragraph. We agree that an issue of primary concern to transferring parties is reliable access to facilities for long-term water transfers. As noted on page A-5, this certainty does not exist under the current system and operating constraints. Development of a Delta water transfer market will require adequate flexibility and capacity in Delta channels and conveyance facilities to allow water to be transferred efficiently and reliably, while minimizing impacts on the ecosystem and delivery of SWP and CVP supplies.

Page A-6, first set of bullets. The discussion on how CALFED's storage and conveyance alternatives could improve opportunities for water transfers should be expanded to state that new conveyance facilities could help reduce carriage water losses. Carriage water losses are a major impediment to cross-Delta water transfers.

Page A-8, second paragraph. We believe this paragraph understates the potential demand for water transfers from Southern California. Our agency has identified water transfers from the Central Valley as a future resource option and has issued a RFP for up to 100,000 acre-feet of transfers. Other Metropolitan member and sub-member agencies are pursuing water transfers as well. The 400,000 acre-feet of dry-year

transfers identified by Metropolitan in its IRP may or may not duplicate needs identified by its member or sub-member agencies through their own planning efforts. Metropolitan is in the process of updating its IRP and its projected need for water transfers may be revised as a result of this effort.

Page A-9, Sources of Transfer Water. The list of potential sources should be expanded to include the transfer or sale of project entitlement water (for south-of-Delta transfers).

Page A-9, Speculative Demand Potential for Water Transfers to Meet Environmental Needs. The first paragraph under this section should state that that transfers for environmental purposes can multiple benefits. For example, transfer water used to meet ecosystem needs along specific stretches of a waterway can be used downstream by agricultural and urban water users. This situation can hold true for urban or agricultural water transfers as well.

### **Water Quality Program Technical Appendix**

*(Unless stated otherwise, all pages numbers cited refer to the Water Quality Program Technical Appendix.)*

Page 25, Water Treatment, Action 1. What incentives does CALFED propose to provide for addition of enhanced coagulation, ozone, granular activated carbon filtration and/or membrane filtration facilities to the water systems treating water from the Delta region? CUWA's *Bay-Delta Water Quality Evaluation Draft Final Report* estimates that the cost of these treatment technologies range from \$16 to \$34 per acre-foot for enhanced coagulation to \$340 to \$650 per acre-foot for reverse osmosis (excluding water losses). The proposed Water Quality Program funding level, approximately \$25 million per year according to CALFED's Phase 2 Interim Report, is inadequate to finance the addition of advanced treatment of all Delta water delivered for municipal and industrial uses.

Page 25, Water Treatment, Action 1. The proposed performance measure for this actions appear to be incorrect -- decreased detection of TOC, pathogens, turbidity and bromides at drinking water intakes would not result from the addition of advanced treatment at facilities treating water from the Delta.

Page 25, Water Treatment, Action 2. This action should include as a method the relocation of island drainage discharges away from drinking water intakes.

Page 26, Water Management Methods. Please clarify the effect of encouraging water recycling in areas that discharge wastewater to salt sinks on the impairment of



beneficial uses associated with salinity. Is reduced impairment of beneficial uses associated with salinity expected to occur due to reduced demands on the Delta? We would disagree with this assumption on the basis that recycled water will be used by urban agencies to reduce water supply shortfalls and will not necessarily result in decreased demands on the Delta. We agree that water recycling in those areas where wastewater would otherwise flow to the Delta or its tributaries could reduce the impairment of beneficial uses to the extent that it results in reduced TDS loading to the Delta.

Page 27, Human Health (as amended by errata sheet dated February 27). The Water Quality Program, as proposed, will not appreciably reduce bromide levels. The level of annual funding proposed (\$25 million) is insufficient to finance the addition of advanced treatment at water treatment facilities, and the only other measure proposed for bromide reduction is to move municipal water intakes to areas less impacted by bromide. We are aware of no location within the Delta that is sufficiently removed from the influence of bromide to meet municipal water quality needs under a plausibly conservative long-term regulatory scenario (e.g., a *Cryptosporidium* inactivation requirement and a 5 µg/L bromate limit).

Page 42, Table 5. Table 5 notes that urban water agencies are further analyzing source water quality requirements assuming alternative treatment technologies and constituent levels. This analysis is included in the CUWA *Bay-Delta Water Quality Evaluation Draft Final Report*, which was submitted to CALFED by CUWA. The revised report concludes that for currently available advanced water treatment technology (i.e., enhanced coagulation and ozone disinfection) to meet potential long-term drinking water quality standards, water diverted from the Delta should have TOC concentrations of 3.0 mg/L or less and bromide concentrations of 50 µg/L or less. The TOC and bromide parameter ranges cited in Table 5 (2 - 4 mg/L and 50 - 150 µg/L, respectively) may not be sufficiently conservative to allow agencies to meet drinking water treatment requirements under potential future regulatory scenarios.

Page 47, Footnote oo. We agree that reduced TDS levels would facilitate the development of local water management programs. We also support efforts to reduce the current 10-year averaging period for SWP salinity objectives.

As a general comment, we request that CALFED place greater emphasis on the development of source control measures for TDS, TOC, pathogens and other constituents that impair drinking water quality. The measures proposed to improve water quality for environmental needs are more extensive and, in most cases, developed in more detail than the measures proposed to improve drinking water quality. For example, Action 5 under Wastewater and Industrial Discharge, which would protect drinking water quality, is proposed for evaluation and needs assessment, while Action 2, which would protect environmental water quality, is proposed for implementation.

## Implementation Strategy Technical Appendix

*(Unless stated otherwise, all pages numbers cited refer to the Implementation Strategy Technical Appendix.)*

### Assurances

Page 4, Program Elements. The list of program elements to be assured should include water transfers.

Pages 11 - 12, Staging. We agree that each stage of the Program should be completed before the next begins and each stakeholder group should have strong inducements to complete each and every stage. The following item should be added to the characteristics of a staged implementation strategy:

- each stage should reflect balanced investments in CALFED's four Program objectives (i.e., ecosystem health, water quality, water supply reliability and levee integrity)

Page 12, Staging. The last bullet under characteristics of a staged implementation strategy should be amended to read "program elements which are outside the control of the CALFED agencies should be implemented as early as possible, consistent with a balanced implementation strategy, to reduce the risk that outside actors may affect implementation." We would also suggest that the bullet be revised to clarify the term "outside actors". Does CALFED include the general public in this category? We assume that CALFED is not suggesting that the role of the public in determining what projects are implemented in their communities be reduced; however, the bullet could be interpreted in that manner.

The following are general comments on the issue of assurances and staged implementation:

1. The Program implementation plan should reflect a balanced mix of investments in ecosystem, water quality, water supply reliability, and system integrity improvements and should ensure that no objective moves forward ahead of the others.
2. The assurances package should include a habitat conservation plan with a no surprises provision, and other protections as may be necessary to assure stakeholders regulatory certainty and water supply reliability.
3. Development of broad-based support for a CALFED solution may require local as well as statewide assurances. For example, our agency is a member agency of the Metropolitan Water District of Southern California, which receives water from both the

Delta and the Colorado River. For six months of the year, our agency receives no water from the Delta, while during the other six months, we receive only 25 percent of our supplies from the Delta. We, and other agencies in our situation, must be assured that we will receive a fair share of benefits from a CALFED solution in return for our financial contributions. Local assurances are one of many elements that are outside of CALFED's direct control, but are nonetheless necessary for its ultimate success. The PEIS/R should recognize this.

4. The PEIS/R must contain enough detail to allow CEQA/NEPA approval and to obtain a programmatic Section 404 permit for the entire CALFED Program, including those actions that may be subject to future decisions or triggers.

#### Financing

Page 15, first paragraph. We agree that the Program cost apportionment should be benefits-based. The establishment of a "financial baseline" to adjust for past impacts is inconsistent with a benefits-based cost allocation approach and is unlikely to result in a finance package that all stakeholders can support.

Page 18, first paragraph. The CALFED financing plan must provide an equitable allocation of costs to all those benefiting from improvements in the Bay-Delta system. The establishment of a Delta watershed fee to fund those portions of the common programs that provide broad benefits to water users is appropriate, provided the fee applies to upstream and in-Delta surface and groundwater diversions as well as Delta exports.

Page 19, Ability to Pay. If the cost allocation for certain classes of users is reduced based on their ability to pay, the resulting subsidy must be funded by the public, not by other water users. We agree that any reductions in cost allocations based on inability to pay should be explicitly identified and justified.

Page 19, Crediting. The CALFED cost allocation should reflect the substantial investments that agencies have made and will continue to make in conservation, recycling, the Category III Program, and other activities that further CALFED's objectives.

Page 27, first paragraph. We believe that the establishment of a financial baseline is inconsistent with a benefits-based approach to cost allocation and should not be pursued. Water user funding for a portion of the Ecosystem Restoration Program (ERP) is appropriate if benefits can be demonstrated. A habitat conservation plan incorporating "no surprises" protection, for example, would provide water supply reliability benefits and could provide a rationale for water user funding.

Page 29, Urban Interests. Urban agencies are interested not only in controlling costs, but in ensuring that costs are commensurate with benefits. We are also concerned that water supply benefits produced by the CALFED preferred alternative are cost-effective when compared with other water resource options.

Page 30, Storage and Conveyance Facilities. Storage and conveyance facilities costs should be allocated to those that benefit from the facilities. The portion of the storage facilities earmarked for ecosystem needs should be funded with public moneys, as should those portions of the conveyance facilities that provide ecosystem benefits. The portions of storage that benefit water users should be funded by water users.

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San Diego County Water Authority  
Proposed Policy Principles regarding CALFED Bay-Delta Alternatives  
April 11, 1996

To ensure a safe, reliable water supply for San Diego County, the CALFED Bay-Delta Program preferred alternative must satisfy the following basic policy principles:

**Water Supply Reliability**

- Provide regulatory certainty and predictability of Delta water supplies to help meet the short- and long-term water needs of ~~Southern~~ California.
- Improve the ability to transport water through the Delta in order to enhance future State Project supplies and improve drinking water quality while protecting environmental and other beneficial uses in the Delta.

**Water Quality**

- Improve the quality of water diverted from the Delta to assist in controlling costs of treatment and use, including use for reclaimed water development.

**Ecosystem Protection**

- Contain a comprehensive ecosystem restoration program that will enhance the ecological health of the Bay-Delta, taking into account all factors contributing to the degradation of Bay-Delta habitat and animal species.

**Demand Side Management**

- Include an element which encourages cost-effective demand side management measures such as conservation, water reclamation, groundwater development, and water transfers as a means of reducing demands on the Delta. Control over implementation of these measures should remain at the local agency level. Conservation measures required in the solution alternative should be consistent with those identified in the current Best Management Practices (BMP) process.

**Costs**

- Provide a cost-effective solution when compared with other water supply development options.
- Provide for an equitable allocation of costs to all those benefiting from improvements in the Bay-Delta system.

**San Diego County Water Authority**  
**CALFED Water Transfer Policy Principles**  
November 13, 1997

The San Diego County Water Authority Board of Directors hereby adopts the following policy principles for the CALFED Bay-Delta Program water transfer issues. Authority staff shall be guided by these principles in evaluating and advocating positions in the CALFED process relating to water transfers.

The CALFED Bay-Delta preferred alternative should feature water transfers as one element of an overall solution for the Bay-Delta. The preferred alternative should include a recommendation for an institutional framework that encourages and facilitates water transfers, affords appropriate protection or mitigation for impacts and provides fair, timely procedures for determining the cost and availability of conveyance capacity. Ideally, the preferred alternative should:

1. Provide operational criteria that encourages and facilitates transfers.
2. Provide the facilities and other physical improvements necessary to transfer water efficiently across the Delta.
3. Recognize that access to regional conveyance facilities for wheeling is equally important to access to Central Valley Project (CVP) and State Water Project (SWP) facilities. Without such access, agencies not directly connected to CVP or SWP facilities have only a limited ability -- or no ability -- to participate in transfers. Without this access, development of an efficient water transfer market is impossible.
4. Promote fair, timely procedures for determining cost and availability of conveyance capacity to move transfer water.
5. Encourage agencies that control conveyance facilities to set wheeling rates in accordance with state law and to not use wheeling rates as a way to discourage transfers, with consideration of appropriate appeals procedures left to a neutral decisionmaker.
6. Promote and encourage development of uniform, comprehensive rules regarding "one-stop shopping" for transfer approvals and permits.
7. Encourage transfers that result in no net harm to the Bay-Delta ecosystem and quality of water from Delta.
8. Encourage transfers as a way to meet environmental needs in the Bay-Delta system.

9. Encourage transfers that do not result in overdraft or degradation of groundwater basins.
10. Provide appropriate protection or mitigation for water-rights holders and third-party impacts within the district transferring water.
11. Promote district-to-district transfers.
12. Allow the transfer of water saved through districtwide and on-farm conservation measures.
13. Encourage quantification of water eligible for transfer in an equitable and expeditious manner.
14. Encourage an area seeking to obtain additional water through transfers to use its existing resources efficiently through adherence to and implementation of urban best management practices and agricultural efficient water management practices.

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10/30/97

## CALFED Water Use Efficiency Policy Principles

### Purpose

The San Diego County Water Authority's CALFED water use efficiency policy principles reflect positions adopted by the Board of Directors, direction from the Strategic Plan, the Authority's 1997 Legislative Policy Guidelines and staff recommendations. The principles direct staff in advocating positions in the CALFED Process as they pertain to water use efficiency.

### Policies

**It shall be the Water Authority's policy to support:**

- Inclusion of water use efficiency standards as a core element in the CALFED Process.
- Urban water use efficiency standards in the CALFED Process which consist of implementation of cost-effective best management practices for urban water conservation.
- Water recycling standards in the CALFED Process which consist of planning and implementation, technical and planning assistance, funding assistance and identification and encouragement of regional cost-effective water recycling opportunities.
- A recycling element within the Urban Water Management Plan (UWMP) requirements, consistent with the Urban Water Recycling Feasibility Assessment Guidebook produced by the California Urban Water Agencies and the WaterReuse Association, with implementation verified in the UWMP review process.
- The California Urban Water Conservation Council as the entity designated to set standards definitions, review and evaluate water agency performance and provide certification of compliance with urban water conservation and water recycling standards in the CALFED Process.
- Agricultural water use efficiency standards in the CALFED Process comparable to those contained the Memorandum of Understanding Regarding Efficient Water Management Practices by Agricultural Water Suppliers in California.
- Enforcement mechanisms used to assure implementation of water use efficiency standards in the CALFED Process that stress the use of incentives and include water based sanctions only as part of an acceptable comprehensive CALFED solution.



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